



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Stephen E. Hershkowitz, Esq.
Sandler, Reiff & Young, P.C.
50 E. Street, S.E.
Washington, D.C. 20463

DEC 22 2008

RE: MUR 5927
Joseph A. Solomon

Dear Mr. Hershkowitz:

On July 23, 2007, the Federal Election Commission (the "Commission") notified your client, Joseph A. Solomon, of a complaint alleging that he violated the Federal Election Campaign Act of 1971, as amended (the "Act"), and provided your client with a copy of the complaint.

After reviewing the allegations contained in the complaint, your client's response, and publicly available information, the Commission on December 3, 2008, found reason to believe that Joseph A. Solomon violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f, provisions of the Act. Enclosed is the Factual and Legal Analysis that sets forth the basis for the Commission's determination.

[Redacted content]

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In the meantime, this matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your client wishes the matter to be made public. We look forward to your response.

On behalf of the Commission,



Donald F. McGahn II
Chairman

Enclosures
Factual and Legal Analysis

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1 **FEDERAL ELECTION COMMISSION**

2 **FACTUAL AND LEGAL ANALYSIS**

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4 **RESPONDENT: Joseph A. Solomon**

MUR 5927

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6 **I. INTRODUCTION**

7 This matter was generated by a complaint filed with the Federal Election
8 Commission ("Commission") by The Beacon Mutual Insurance Co.

9 **II. FACTUAL AND LEGAL ANALYSIS**

10 The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that
11 no person shall make a contribution in the name of another person. 2 U.S.C. § 441f.
12 Further, during the 2006 election cycle, the Act limited the amount a person could
13 contribute to any candidate for Federal office and his authorized political committees to
14 \$2,100 per election. 2 U.S.C. § 441a(a)(1)(A).

15 Joseph A. Solomon was President and Chief Executive Officer of The Beacon
16 Mutual Insurance Co. ("Beacon"). During 2005, he used his own personal funds to
17 reimburse Pamela L. Alarie (Beacon's Director of Human Resources), Christina M. Burton
18 (Mr. Solomon's Executive Assistant), and Sheldon S. Sollosy (the Chairman of Beacon's
19 Board of Directors) for their respective \$1,000 contributions to Whitehouse '06, the
20 principal campaign committee of Sheldon Whitehouse in the 2006 election for U.S. Senate
21 from Rhode Island. Mr. Solomon also made a \$2,100 contribution in his own name to
22 Whitehouse '06 on June 2, 2005. When Mr. Solomon's \$2,100 contribution is aggregated
23 with the \$3,000 in contributions he made in the names of Ms. Alarie, Ms. Burton, and
24 Mr. Sollosy, he exceeded the Act's contribution limit by \$3,000.

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- 1 Accordingly, there is reason to believe Joseph A. Solomon violated 2 U.S.C.**
- 2 §§ 441a(a)(1)(A) and 441f.**

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